

THIOESTERS ASSOCIATION

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December 18, 2001

Submitted electronically to:

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Oppt.ncic@epa.gov

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RECEIVED
OPPT NCIC

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

RE: HPV Submission for Thiobis, Propanoic Acid Derivatives Category under
Registration #

Dear Ms. Whitman:

I am submitting the attached data package to EPA as part of the Thioesters Association's commitment under the U.S. High Production Volume (HPV) Challenge Program. The attached data package was prepared for the Thiobis, Propanoic Acid Derivatives category, which includes the following compounds:

CAS Numbers	Thiobis, Propanoic Acid Derivatives EPA chemical names (Chemical Names in Attachments)
123-28-4	Propionic acid, 3,3'-thiodi-, didodecyl ester (3,3'-thiodipropionic acid, didodecyl ester)
693-36-7	Propionic acid, 3,3'-thiodi-, dioctadecyl ester (3,3'-thiodipropionic acid, dioctadecyl ester)
10595-72-9	Propionic acid, 3,3'-thiodi-, ditridecyl ester (3,3'-thiodipropionic acid, ditridecyl ester)

Previously the following compound was included in this category:

CAS Numbers	Thiobis, Propanoic Acid Derivatives
4131-74-2	Propanoic acid, 3,3'-thiobis-, dimethyl ester

The sponsorship of this compound has been transferred from the Thioesters Association to Crompton Corporation, as per the attached letter.

C. Whitman, EPA
Registration #
Submission Date: December 18, 2001
Page 2

This submission is being made on behalf of the following Association member companies:

- Bruno Bock Chemische Fabrik GmbH & Co KG
- Crompton Corporation
- Cytec Industries Inc.
- ATOFINA Chemicals, Inc
- Hampshire Chemical Corp., a wholly owned subsidiary of The Dow Chemical Company
- Rohm and Haas Company

The following companies have withdrawn their membership from the Association:

- Merck KgaA
- EM Industries, an associate of Merck KgaA

If you have any questions, or would like to meet with the Association to discuss this submission, please contact me at (703) 669-5688 or via e-mail at ehunt@adelphia.net.

Sincerely,

Submitted electronically

Elizabeth K. Hunt
Executive Director

Attachments:

- Test Plan for Thiodipropionates Category (see testplan.pdf)
- IUCLID Data Set for 3,3'-thiodipropionic acid, didodecyl ester (see 123284.pdf)
- IUCLID Data Set for 3,3'-thiodipropionic acid, dioctadecyl ester (see 693367.pdf)
- IUCLID Data Set for 3,3'-thiodipropionic acid, ditridecyl ester (see 10595729.pdf)
- Crompton Letter Transferring Commitment for 4131-74-2 (see crompton4131742.doc)